

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

<b>In re:</b>  <b>ASTRALABS, INC.,</b>  <b>Debtor.</b>	§ § § § §	<b>Case No. 23-10164-smr</b>  <b>Chapter 7</b>
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**TRUSTEE’S WITNESS AND EXHIBIT  
LIST FOR DECEMBER 18, 2023 HEARING**

TO THE HONORABLE SHAD M. ROBINSON, U.S. BANKRUPTCY JUDGE, AND TO ALL PARTIES:

Randolph N. Osherow, not individually but in his capacity as the duly appointed chapter 7 trustee (in such capacity, the “Trustee”), for and on behalf of ASTRALABS, Inc. (the “Debtor”), hereby submits this Witness and Exhibit List in connection with the initial hearing to be held on December 18, 2023, at 1:30 p.m. (prevailing Central Time) (the “Initial Hearing”), to consider the *Trustee’s Motion (I) for Authority to Sell Designated Securities Warrants, Free and Clear of All Liens, Claims, and Encumbrances; (II) for Approval of Notice, Sale, and Executory Contract Procedures; and (III) to Set Final Hearing to Approve Sale and Good Faith Designation to Prevailing Purchaser(s)* [Docket No. 351] (the “Sale Procedures Motion”) and any other matters taken up by the Court at the Hearing.

**WITNESSES**

The Trustee reserves all rights to call any or all of the following as witnesses at the Initial Hearing, including but not limited to by affidavit, declaration, or proffer.

1. Randolph N. Osherow, in his capacity as the Trustee;
2. Chad Harding, Managing Partner, PEAK Technology Partners, LLC;
3. Any witness called or designated by any other party; and
4. Any rebuttal witnesses, as appropriate.

### **EXHIBITS**

The Trustee reserves all rights to introduce and/or request judicial notice of any or all of the following Exhibits as evidence at the Hearing, each as may be amended, and expressly including any filed responses thereto, and any exhibits, schedules, addenda, and any and all other attachments or amendments thereto and thereof:

<b>No.</b>	<b>Description</b>	<b>MARKED</b>	<b>OFFERED</b>	<b>OBJECT</b>	<b>ADMIT</b>
1.	<u>Exhibits to the Sale Procedures Motion</u> <ul style="list-style-type: none"> <li>• 1-A - sample Warrant</li> <li>• 1-B - proposed Notice of Sale and Final Hearing                             <ul style="list-style-type: none"> <li>○ Sale Procedures                                     <ul style="list-style-type: none"> <li>▪ Ex. 1 - Sale Assets / Executory Contract Schedule</li> <li>▪ Ex. 2 - form of Non-Disclosure Agreement</li> <li>▪ Ex. 3 - form of Asset Purchase Agreement</li> <li>▪ Ex. 4 - proposed Final Sale Order</li> </ul> </li> </ul> </li> <li>• 1-C – proposed Initial Sale Order</li> </ul>				
2.	Debtor’s Amended Conversion Schedule A/B [Docket No. 318]				
3.	Declaration of Randolph N. Osherow, Chapter 7 Trustee				
4.	Declaration of Chad Harding, PEAK Technology Partners, LLC				
5.	Excerpt of Transcript of May 11, 2023 Hearing (p. 42)				
6.	Proposed Sale Schedule (demonstrative / working exhibit)				
7.	Copies of Designated Securities Warrants				
8.	Any and all Motions, Notices, pleadings, and other docket items filed of record in the Bankruptcy Case				
9.	Any and all exhibits designated by any other party				
10.	Any and all other exhibits as may be appropriate for rebuttal or impeachment purposes				

Dated: December 13, 2023

Respectfully submitted,

By: /s/ Jay H. Ong  
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Texas Bar No. 24028756  
Thanhan Nguyen  
Texas Bar No. 24118479  
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**Counsel For Randolph N. Osherow,  
Chapter 7 Trustee**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that, on the 13th day of December 2023, he personally caused true and correct copies of the foregoing document to be served by electronically filing it with the Court using the Court's CM/ECF system, which sent notification to the parties receiving same through such system. A true and correct copy of the document, together with the listed exhibits, was also served via electronic mail on the following parties:

Robert Chamless Lane on behalf of Debtor ASTRALABS Inc  
[chip.lane@lanelaw.com](mailto:chip.lane@lanelaw.com)

Ron Satija on behalf of Andrew Ryan  
[rsatija@haywardfirm.com](mailto:rsatija@haywardfirm.com)

Shane P. Tobin on behalf of U.S. Trustee United States Trustee - AU12  
[shane.p.tobin@usdoj.gov](mailto:shane.p.tobin@usdoj.gov)

By: /s/ Thanhan Nguyen  
Thanhan Nguyen, Esq.